# Air Plan Development Meeting Notes
**November 4, 2008**

Key air quality concerns and issues identified by staff who participated in the November 4, 2008 Air Plan development meeting have been placed into one of 15 topic categories that generally describe the content of the concerns and issues. The categories (in alphabetical order) are as follows:

Climate Change/GHGs
Coal Plants
Communications with Public and Stakeholders
Emissions Inventory
Enforcement
Expanded Air Quality Modeling
Information Management and Technology
Program Management and Implementation
Permitting
PM2.5 Control Strategies
Public Health Agencies
Rules and Statutes
Staff Training
Statewide Standards
Sustainable Funding

The concerns and issues are summarized by each topic category below.

Climate Change/GHGs

- Greenhouse gas regulation.
- Try to encourage greenhouse gas emissions (energy usage) reduction on an individual basis.
- Lead by example: measure Air Quality Bureau's carbon footprint and join the Climate Registry.

Coal Plants

- Coal plant moratorium.
- Promote the replacement of older coal fired boilers with modern units.
- Implement 112(j) on coal-fired boilers. If we do it now we will get reductions earlier than if we wait for EPA. This will reduce PM, HAPs, acid gas emissions from approximately 40 units, including 9 in Muscatine.
- Require a higher level of control on new coal-fired power plants and incentives to remove old plants.

Communications with Public and Stakeholders

- Correct misinformation.
- Procedures for media access.
- Air quality is everyone's responsibility. Engage the public to contribute to clean the air.
- Simplify our talk so the public can understand it.

- Air quality “show and tell” at the Science Center of Iowa. Teach kids coming to the center what we want them to know.
- Relate air quality to the quality of people’s lives. (Waste management, comprehensive clean Earth program, energy, air quality combined efforts).
- Increase educational outreach for source specific sectors (like an Air School). Examples are the grain elevators, waste water treatment facilities, MACTs, etc.
- Communication of new rules to industry.
- Increase public awareness of asbestos regulations for demolition and renovation and why these regulations are important.
- Heighten our profile in the public eye. Reach out to college and elementary classes. Elementary kids will tell parent. We can get enthusiastic college kids to work for AQB once graduated.
- DNR Image: When we are talking to the public make sure that we know what we are talking about. Stick to our decisions. Be consistent across the Air Quality Bureau. The public won’t be willing to recognize our authority if we don’t behave like we have it.
- Develop an air quality forecasting system to inform the public in advance of poor air quality and be preventative in public health.
- Lead education, awareness, workshop for facilities that have lead emissions.

Emissions Inventory

- Develop comprehensive emissions inventory. Example: expand EI to include mobile sources; detailed agriculture ammonia emission inventory, and area sources. The first two are most important.
- Once EPA publishes emission data from CAFOs, work with producers to estimate emissions from Iowa’s CAFOs. Make decisions based on data.
- Air Quality Bureau audits every major source EIQ.
- Develop a plan to inventory and reduce transportation emissions in Iowa. They are 58% of Iowa’s emissions.

Enforcement

- Enforcement communication with the Attorney General’s office to speed up the penalty process. Example – allow facilities to settle quicker.
- Field staff to write tickets.
- Tickets for asbestos violations.
- Report your neighbor program with 10% of monetary fines to go back to reporters.
- More stringent deadlines and enforcement actions for non-compliance (submitting an inventory on time).
- Charge fees for minor source violations.
- More deliberate enforcement actions, quicker with a unified front.
- Increase facility inspections to Title V facilities to annually and all other permitted facilities to every other year.
- More inspections, more field inspections or allow Air Quality Bureau staff to do inspections.
- Expand the asbestos program to the Field Offices (medical monitoring of inspectors required).
- List of SEPS that we would agree on, especially ones related to energy.
- Target outreach and enforcement activities for new area sources NESHAP in urban areas where health effects are likely to be more prevalent. Additional Air Quality and Field Office staff would be very helpful.

- Have facilities sign off at the end of inspections stating they don't know of any more violations.
- Much more enforcement and more serious actions against violators. Add habitual violator rule.

Expanded Air Quality Modeling

- Do more modeling on a larger scale (industrial parks).
- In depth soils, vegetation, and endangered species analysis.
- Require more thorough PSD/NSR environmental impact assessments, i.e. wildlife/endangered species impacts.
- Model Title V facilities.
- Additional staffing particularly for modeling relating to planning issues.
- Utilize modeling, where applicable, to quantify magnitude and location of impacts, and results of actions/strategies. Develop database of impacts using consistent set of activities.
- Minor source increment modeling.

Information Management and Technology

- Fix SPARS quirks so staff and industries can use it more effectively.
- Open Records database to the public via the Internet.
- Web access program with DocDNA – fee procedures.
- Facility contact database. Link to contact information, database improvement.
- Utilize modern technologies to perform duties. Example: laser opacity monitor to decrease argument of human error in method 9.
- Expedited CROMERR approval for affected data systems.
- Expand video conference system to air quality. Field offices have had good success with the system.
- Support mobile and aerial monitoring platforms.

Program Management and Implementation

- Be efficient/streamline bureau operations.
- When we do strategic planning and set goals we shouldn't focus only on goals we can achieve.
- More inter DNR-EPA communication for better understanding and cooperation.
- Be able to "sell" solutions with all benefits including water and solid waste.
- Be able to make decisions and stick to them.
- Resources - making decisions to allow DNR to move away from constant issues where there is no more low hanging fruit.
- Develop an ADI for our bureau for rule interpretations, applicability, variance criteria, - something more consistent than asking each other if we remember a certain situation or digging through files.
- Assign a point of contact/expert to the most polluting industries. Goal is to encourage emission reduction.
- Recognition for facilities that go above and beyond compliance (Performance Track). Maybe a section on our website were the public can see who the "good guys" are.
- Decrease partnerships that aren't really beneficial.
- Continue /expand interstate technical coordination. Example: LADCO for PM 2.5. Avoid the CENRAP approach.
- Consultant disincentive program for poor performing consultants.

- Spruce up Program. Demolition of buildings and UST removals with contractors to help small communities with little to no cost to them. South Dakota example.
- Better communication and guidance from EPA and also the Governor's Office.

Permitting
- Promote best technologies and practices. Examples: waste to energy instead of land filling, IGCC, and new control technologies.
- Expiration date on construction permits.
- Do we limit ourselves to traditionally regulated sources or do we "regulate" sources we've ignored (transportation, etc.)? We should expand our scope.
- To expedite TV renewals, the construction, compliance, and legal sections should set higher priorities to these cases that the TV section is waiting for.
- Regulate other air quality pollution sources – ag, gravel roads, etc.

PM 2.5 Control Strategies
- Establish precursors (NOx, SO2, and NH3)
- Control strategies to reduce PM 2.5 levels.
- Do we limit ourselves to direct sources (EGUs) or do we look to sources that have secondary impacts? We should regulate activities that cause others to emit.

Public Health Agencies
- Better coordination with the Department of Public Health.
- Work more with public health agencies (state, county, and city).

Rules and Statutes
- Update RACT rules.
- Cut RACT limits in half.
- Bring rules into 2008. Rules to protect NAAQS. Air toxic rules.
- Toxic regulations/program.
- Regulate odor and toxics.
- Regulate odors from industrial sources. Odor is an air pollutant and ruins the quality of life.
- CAFO air rules.
- Write our own asbestos regulations.
- Establish system wide regulations such as "single source" environmental impacts, presumptive BACT program, start RACT program.
- Work closer with EPA Headquarters to fix problems with regulations.
- Deal with Iowa Code Statute with the issue of not being more stringent than EPA. Should be at least as strict but could be stricter.

Staff Training
- Technical track professional career options.
- Formal employee advancement and training program.
- Establish a formal education workgroup.
- Seminar series to allow employees to share knowledge and improve communication.
- Expand communication between Air Quality and other program areas.
- Air Currents magazine (start doing it again).
- Cross training between sections.

- Cut down on “re-work” to be more efficient for customers (more knowledge, training, consistent policies).

Statewide Standards

- New sources should have to meet tighter limits than sources installed 25 years ago. Require more of new sources.
- Regulate ammonia, ozone, lead, and mercury.
- Iowa specific emission factors could be developed using the new stack test database.
- Open burning ban.
- Promote electrification of truck stops.
- Regulating industries that slip through – ag industry.
- Incentives for reduction of emissions from agriculture (precision farming and digestion of animal waste).
- Develop ambient air quality standards for Iowa based on the views of health researchers and ecologists.
- Do we limit ourselves to minimum standards such as NAAQS or do we enhance our environment? We should enhance!
- Set standards for how we allow major sources to consume increment.

Sustainable Funding

- Reinstate the charter agency status (purchasing).
- Minor source/greenhouse gas emissions inventory fees.
- Construction permit fees.
- Restructure the Title V fee. Twenty-five companies pay 90% of the fees. Make it a user based fee. Add application and modification fees. Have a minimum fee. Remove the dollar fee cap in the IAC.
- Remove the 4,000 ton fee cap for the Title V fees.
- Title V application fee.
- Transportation funding/mobile source fee. Citizens of the State should realize the impact of transportation emissions and pay appropriately. Add fee to vehicle registration. Add tax to fuel (more equitable). Congestion charges.
- Sustainable funding for new programs like climate change, CAFOs, and Lead.
- Sustainable funding for existing programs. Emissions fee on all sources, asbestos fee, construction permit fees, or charge fees on all activities (stack tests, modeling, TV applications and modifications, construction permit fees).
- Sustainable funding (asbestos, construction permits, modeling fees).
- Asbestos demolition and renovation fees.
- Develop a fund to direct academics to do research that needs to be done for the DNR.
- Corn tax to fund bio-fuel work.
- Construction permit fees “Cougars for permits”. Combine SEPs and fees for income for the Department and education.